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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all similarly  
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF BRUCE SCHNEIER  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

Judge: Hon. Yvonne Gonzalez Rogers  
Date: September 20, 2022  
Time: 2:00 p.m.  
Location: Courtroom 1 – 4th Floor

**DECLARATION OF BRUCE SCHNEIER**

I, Bruce Schneier, declare:

1. Counsel for the *Brown* Plaintiffs retained me to provide expert analysis and, if requested, expert testimony, in the *Brown* matter. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this declaration in connection with Plaintiffs' Motion for Class Certification.

3. Attached are true and correct copies of (1) the April 15, 2022 Expert Report that I prepared in connection with this matter, including all appendices; and (2) the June 7, 2022 Expert Rebuttal Report that I prepared in connection with this matter, including all appendices. The opinions I provided therein are true and correct to the best of my knowledge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 20th day of June, 2022, at Cambridge, Massachusetts.

/s/ Bruce Schneier

**Bruce Schneier**  
**4.15.2022 Expert Report and all**  
**Appendices**  
**(Plaintiffs)**

**[Document Filed Under Seal]**

**Bruce Schneier**  
**6.7.2022 Rebuttal Expert Report and all**  
**Appendices**  
**(Plaintiffs)**

**[Document Filed Under Seal]**